

**IN THE UNITED STATE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
	§	CRIMINAL NO. 3:19-CR-00452
v.	§	
	§	
BRIAN CARPENTER (1)	§	

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Brian Carpenter, and respectfully submits his request for this Honorable Court to grant him permission to travel outside the State of Texas for two previously scheduled trips and would show the following:

I.

Defendant was indicted September 11, 2019 for 18 U.S.C. § 1349 (18 U.S.C. § 1347) Conspiracy to Commit Health Care Fraud (Count 1) and 18 U.S.C. §§ 1347 and 2 Health Care Fraud (Counts 2-7). As part of his pretrial release, Defendant was required to surrender his passport to the U.S. District Clerk for the Northern District of Texas and his travel is restricted to Texas unless otherwise authorized by Defendant's Pretrial Service Officer. Defendant's Pretrial Service Officer has informed Defendant that he cannot authorize the travel for these two trips without the specific approval of the Court.

II.

Defendant is a single father of three teenage boys. He employed Patrycja Moslykowska to help care for the boys. During the 3-4 years she was employed by Defendant, she became like a daughter to him and she has requested his presence and participation in her wedding that is set to take place in Amalfi, Italy on November 19, 2019. The defendant, along with his father,

father's girlfriend, his sister and her husband are scheduled to leave for Madrid, Spain on November 4, 2019. The tickets for this occasion were purchased on July 7, 2019.

Defendant requests the U.S. District Clerk's Office release his passport for this occasion on Friday, November 1, 2019 or the morning of Monday, November 4, 2019. Defendant will return his passport to the U.S. District Clerk's Office upon his return on Tuesday, November 12, 2019.

III.

Defendant booked flights on May 19, 2019 to attend a trip with Grace Fellowship Church for a trip to Israel from January 11-21, 2020. He has been asked come as a mentor and to assist his pastor during the trip.

Defendant requests the U.S. District Clerk's Office release his passport for this occasion on Friday, January 10, 2020. Defendant will return his passport to the U.S. District Clerk's Office upon his return on Thursday, January 23, 2020.

IV.

Defendant is not a flight risk. He has been aware of these allegations since June 2016. He is the sole provider for his teenage sons who reside with him in Wise County, Texas. He has a father in Bridgeport, Texas and a sister in Keller, Texas. Defendant recently suffered a series of seizures starting October 9th and ending October 21st.

WHEREFORE PREMISES CONSIDERED, Defendant prays this court will grant him permission to travel abroad on these two occasions.

Respectfully submitted,

/S/ Robert T. Jarvis

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CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with USDOJ Trial Attorney Brynn Schiess regarding the foregoing motion and she opposed.

/S/ Robert T. Jarvis
Robert T. Jarvis

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the Entry of Appearance of Counsel was filed electronically, and through that system all parties have had this motion forwarded to them.

/S/ Robert T. Jarvis
Robert T. Jarvis